

EXHIBIT A

DISCOVERY COMPLETED IN *CARROLL I*

Written Discovery		
Discovery Type	Plaintiff	Defendant
Document Production	30,799 pages	10 pages
Substantive Interrogatories Responses	19 responses	4 responses
Substantive RFA Responses	n/a	42 responses
Expert Reports	1 report	1 rebuttal report
Depositions		
Deponent		Noticing/Subpoenaing Party
E. Jean Carroll		Defendant
Donald J. Trump		Plaintiff
Lisa Birnbach (Friend of Plaintiff)		Defendant
Carol Martin (Friend of Plaintiff)		Defendant
Cande Carroll (Sister of Plaintiff)		Plaintiff
Robbie Myers (Former Editor-in-Chief of Elle Magazine)		Plaintiff
Natasha Stoyneff (Person Who Has Accused Defendant of Similar Sexual Misconduct)		Plaintiff
Jessica Leeds (Person Who Has Accused Defendant of Similar Sexual Misconduct)		Plaintiff
Stephanie Grisham (Former White House Press Secretary)		Plaintiff
Professor Ashlee Humphreys (Plaintiff's Expert)		Defendant
Robert J. Fisher (Defendant's Rebuttal Expert)		Plaintiff